REMARKS

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action mailed March 22, 2002. Reexamination and reconsideration are respectfully requested.

The Office Action

Claims 1-13 were presented for examination.

During a telephone conversation with David Rikkers on March 13, 2002, a provisional election was made without traverse to prosecute the invention of group I, claims 1-8 and 13.

A typographical error was noted in claim 13 by the omission the word "preventing" in line 4.

Claims 1-8 and 13 stand rejected as being anticipated by Kiyohara.

Elections/Restrictions

Affirmation of the election without traverse to prosecute the invention of group I, claims 1-8 and 13 is now made. Accordingly, claims 9-12 have been canceled.

The Non-Art Objections/Rejections

The specification has been amended to specify that biasing member 600 is preferably a pinch spring, but that it may also be a leaf spring or other spring or elastic member.

Claim 13 has been amended by inclusion of a the word "preventing."

The Art Rejections

Turning to rejected claims 1-4, Kiyohara is alleged to disclose a paper guide 3 and a biasing member 52. Particular attention has been made to Figure 5 of Kiyohara, which shows the paper 47 being fed between the guide 3 and the spring 52 as the spring 52 presses the paper 47 against the guide 3. Based on these disclosures, it is argued Kiyohara teaches the concepts of the present claims 1-4.

Kiyohara is specifically directed to a sheet feed device for use with an ink jet printer or a thermal printer that has feed rollers mounted on the same shaft in a spaced relationship

and platen blocks mounted in spaces between the feed rollers. A sheet fed along the feed rollers is conveyed to the platen blocks by a feed force of the feed rollers.

However, Applicant notes that Kiyohara does not teach or fairly disclose the concept of mounting a biasing member to the image forming system and biasing the member against the paper guide along the paper path such that an edge of the printing device extends beyond the paper guide to allow printing along a trailing edge of the paper. In this particular embodiment, the printing device can imprint the paper very close to the trailing edge of the paper. Applicant has amended the independent claim 1 to further emphasize this point.

Thus, as Kiyohara and the other cited material provide no concept of allowing an edge of the printing device to extend beyond the paper guide to allow printing along a trailing edge of the paper, it is respectfully submitted the concepts of independent claim 1 are not taught or fairly suggested by the cited art.

As claims 2-4 depend from and further define claim 1, it is submitted these claims are also distinguished.

Turning to rejected claims 5-8, Kiyohara is again alleged to disclose a paper guide 3 and a biasing member 52. And again it is argued that Figure 5 of Kiyohara shows the paper 47 being fed between the guide 3 and the spring 52 as the spring 52 presses the paper 47 against the guide 3. Based on these disclosures, it is argued Kiyohara teaches the concepts of the present claims 5-8.

However, as noted above, Kiyohara does not teach or fairly disclose the concept of mounting a biasing member to the image forming system and biasing the member against the paper guide along the paper path such that an edge of the printing device extends beyond the paper guide. This patent also does not teach or fairly suggest that a printing area of the printing device will thereby be located at a position where the biasing member and paper guide meet. Thus, in this embodiment, the printing device can imprint the paper very close to the trailing edge of the paper. Applicant has amended the independent claim 5 to further emphasize this point.

Therefore, as Kiyohara and the other cited material provide no concept of allowing an edge of the printing device to extend beyond the paper guide to allow printing along a trailing edge of the paper, it is respectfully submitted the concepts of independent claim 5 are not taught or fairly suggested by the cited art.

As claims 6-8 depend from and further define claim 5, it is submitted these claims are also distinguished.

Turning to independent claim 13, it is argued that all the positively recited method steps are carried out by the structure mentioned in the prior art rejection of claims 1 and 5. It is also argued that Kiyohara further discloses locating a printing device 48 proximate the biasing member 52 as shown in Figure 5 of Kiyohara.

However, Applicant notes that Kiyohara does not teach or fairly disclose the concept of moving a printing device over the paper while allowing an edge of the printing device to extend beyond the paper guide. Accordingly, this method allows the printing device to imprint the paper very close to the trailing edge of the paper. Applicant has amended the independent claim 13 to further emphasize this point.

New dependent claims 14 and 15 further emphasize the structure recited in claim 1, and claim 16 provides additional details to the steps of claim 13.

Therefore, as Kiyohara and the other cited material provide no concept of moving a printing device over the paper while allowing an edge of the printing device to extend beyond the paper guide, it is respectfully submitted the concepts of independent claim 13 are not taught or fairly suggested by the cited art.

CONCLUSION

For the reasons detailed above, it is respectfully submitted that independent claims 1, 5, and 13 and the claims depending therefrom in the present patent application are in condition for allowance. An early notice to that effect is earnestly solicited.

Respectfully submitted,

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Attachment: Version With Markings to Show Changes Made

CERTIFICATE OF MAILING

I hereby certify that this Amendment A is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Assistant Commissioner of Patents and Trademarks, Washington, D.C. 20231, on July 22, 2002.

Karen M. Forsyth

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ATTY. DKT NO. D/99368

VERSION WITH MARKINGS TO SHOW CHANGES MADE

In the Specification

On page 3, lines 13-29, please amend as follows:

According to a first embodiment of the invention, Figure 1 provides an illustration of a biasing member 600 in communication with a paper guide 610 so as to provide the ability to hold a piece of paper 620 on a paper path firmly to the paper guide 610, allowing the head carriage 630 to come in communication with the paper 620 near a trailing edge of the paper 620. The biasing member 600 is biased against the paper guide 610, preferably asserting a force against the paper guide 610 so as to keep the paper taut to a location further along the paper path. By keeping the paper taut, an image can be properly formed on the paper by a printing device. [Examples of] Preferably, biasing member[s] 600 [include] is a pinch spring, but may also be a leaf spring or other spring or elastic member. The biasing member 600 is preferably securely mounted to an image forming system frame at an end opposite the end of the biasing member 600 in communication with the paper guide 610. Alternatively, biasing member 600 may be mounted at any of one or more locations along biasing member 600 such that a portion of biasing member 600 is biased against the paper guide 610. The paper guide 610 functions to guide the paper within the image forming system. Preferably, the paper guide 610 is a roller, but may also be a device formed to guide the paper, such as a metal or plastic component formed to allow the paper to slide along the device.

In the Claims

Please cancel claims 9 - 12.

Please amend claims 1, 5 and 13 as follows:

1. (Amended) A trailing edge deletion prevention apparatus suitable for use with an image forming system, comprising:

a paper guide mounted along a paper path and adapted to guide [said] paper along said paper path; and

a biasing member mounted to said image forming system and biased against said paper guide along said paper path and allowing a printing device to [pass proximate to said biasing member while printing] be moved over said paper while allowing an edge of said printing device to extend beyond said paper guide and print along a trailing edge of said paper.

- 5. (Amended) A trailing edge deletion prevention apparatus suitable for use with an image forming system, comprising:
- a paper guide mounted along a paper path and adapted to guide [said] paper along said paper path; and
- a biasing member mounted to said image forming system and biased against said paper guide to cause said paper to be taut to a location further along said paper path and configured to accommodate a printing device that is configured to move over said paper such that an edge of said printing device extends beyond said paper guide to a position wherein a printing area of the printing device is located over a position where the biasing member and the paper guide meet [to access a trailing edge of said paper].
- 13. (Amended) A method for preventing deleting a trailing edge of a piece of paper processed by an image forming system, comprising the steps of:

biasing a biasing member against a paper guide;

passing a piece of paper between said biasing member and said paper guide such that said piece of paper is taut to a location further along a paper path; and

[locating a printing device proximate to said biasing member and said paper guide] moving a printing device over said piece of paper while allowing an edge of said printing device to extend beyond said paper guide to allow an image to be formed along a trailing edge of said paper.

Please add new claims 14-16 as follows:

- 14. (New) The trailing edge deletion prevention apparatus of claim 1 further including,

 a paper guide/biasing member position wherein the paper guide and biasing member meet.
- 15. (New) The trailing edge deletion prevention apparatus of claim 14, wherein the printing device includes a printing area located over the paper guide/biasing member position.
- 16. (New) The method according to claim 13, wherein said moving step includes, locating the printing device over a position where said biasing member and said paper guide meet.

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